

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHUN-KO CHANG, individually and on behalf of all  
others similarly situated,

Plaintiff,

Case No.: 7:24-cv-08980-PMH

-against-

SHEN YUN PERFORMING ARTS, INC., FEI TIAN  
COLLEGE, FEI TIAN ACADEMY OF THE ARTS,  
DRAGON SPRINGS BUDDHIST INC.,  
INTERNATIONAL BANK OF CHICAGO, SHUJIA  
GONG a/k/a TIANLIANG ZHANG, HONGZHI LI, and  
RUI LI,

**DECLARATION IN SUPPORT  
OF MOTION TO WITHDRAW  
AS COUNSEL BY  
JOSHUA J. GRAUER**

Defendants.

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Joshua J. Grauer, being duly sworn, deposes and states pursuant to 28 U.S.C. § 1746:

1. I am a partner and lead attorney at the law firm of Cuddy & Feder, LLC, attorneys for Defendants Shen Yun Performing Arts, Inc., Fei Tian College, Fei Tian Academy of the Arts, and Dragon Springs Buddhist Inc. (collectively, the “Defendants”) in the above-captioned matter. I submit this declaration in support of this instant Motion to Withdraw as Counsel of Record.

2. On or about November 25, 2024, Plaintiff filed her Complaint. Service on Defendants was effectuated on or about December 20, 2024, and Defendants’ deadline for filing their response to the Complaint was January 10, 2025.

3. On or about January 2, 2025, I filed for appearance as counsel for the Defendants and concurrently filed for an extension to respond to the Complaint. The Court granted the request, which extended the deadline to respond to Complaint from January 10, 2025 to February 19, 2025.

4. At all times, I faithfully represented the Defendants and worked diligently and efficiently, advocating, respecting and preserving all rights and defenses, and ensuring all deadlines were maintained.

5. The reason for this request is that Defendants have retained incoming counsel who will be taking over representation.

6. I anticipate that the incoming counsel will need, and promptly seek, an extension of the current date to respond to the Complaint.

7. I do not assert a retaining or charging lien.

8. Defendants consent to and have requested the undersigned to make this motion.

9. Accordingly, I respectfully request that the Court grant the instant Motion to Withdraw as Counsel and terminate my appearance on the docket.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: White Plains, New York  
February 6, 2025

Respectfully submitted,

**CUDDY & FEDER LLP**  
*Attorneys for Defendants*  
445 Hamilton Avenue - 14<sup>th</sup> Floor  
White Plains, New York 10601  
Tel. (914) 761-1300

By: /s/ Joshua J. Grauer  
Joshua J. Grauer (JG4594)

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GONG a/k/a TIANLIANG ZHANG, HONGZHI LI, and  
RUI LI,

Defendants.

-----X

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on the 6th day of February, 2025, the foregoing document has been filed electronically, is available for viewing and downloading from the ECF System, and is being served upon all counsel of record via ECF transmission in accordance with the Electronic Filing System of the Court.

I FURTHER CERTIFY that on February 6, 2025, a copy of the foregoing document has been served via first-class mail on Defendants Shen Yun Performing Arts, Inc., Fei Tian College, Fei Tian Academy of Arts, and Dragon Springs Buddhist Inc. to the following addresses:

Dragon Springs Buddhist Inc.  
140 Galley Hill Road  
Cuddebackville, NY 12729

Shen Yun Performing Arts, Inc.  
140 Galley Hill Road  
Cuddebackville, NY 12729

Fei Tian College  
140 Galley Hill Road  
Cuddebackville, NY 12729

Fei Tian Academy of Arts  
140 Galley Hill Road  
Cuddebackville, NY 12729

/s/ Joshua J. Grauer  
Joshua J. Grauer